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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA**

In re

TEMBLOR PETROLEUM COMPANY, LLC
Debtor.

Case No. 20-11367

Chapter 7

**APPELLANT GENAUTICA OIL
HOLDINGS, LP'S STATEMENT OF
ISSUES ON APPEAL**

[Fed. R. Bankr. P. 8009]

On November 17, 2022, Appellant Genautica Oil Holdings, LP ("Appellant") filed a Notice of Appeal to the *Amended Order on Motion to Sell Estate's Interest in Property Pursuant to 11 U.S.C. Section 363(b)*. Appellant now hereby submits this statement of issues on appeal pursuant to Federal Rule of Bankruptcy Procedure 8009.

STATEMENT OF ISSUES ON APPEAL

1. Whether the Bankruptcy Court erred in granting the chapter 7 trustee's *Motion to Amend Order on Motion to Sell Estate's Interest in Property Pursuant to 11 U.S.C. Section 363(b)* (the "Motion"), hours after the motion was filed, without notice or hearing.

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2. Whether the Bankruptcy Court erred in granting the Motion because selling the property to the lowest bidder was neither an exercise of the trustee’s reasonable business judgment nor in the best interests of the estate.

Dated: December 1, 2022
STRADLING YOCCA CARLSON & RAUTH
A Professional Corporation

By: /s/ Paul R. Glassman
Paul R. Glassman

Attorneys for Genautica Oil Holdings, LP

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Blvd, Suite 1400, Los Angeles, CA 90067

A true and correct copy of the foregoing document APPELLANT GENAUTICA OIL HOLDINGS, LP'S STATEMENT OF ISSUES ON APPEAL will be served or was served (a) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On December 1, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Leonard K. Welsh on behalf of Debtor TEMBLOR PETROLEUM COMPANY, LLC
lwelsh@lkwelshlaw.com; tlidgett@lkwelshlaw.com

D. Max Gardner on behalf of Trustee Jeffrey M. Vetter
jeffreyvetter@hotmail.com; CA97@ecfcbis.com

D. Max Gardner on behalf of Trustee Jeffrey M. Vetter
dmgardner@dmxlaw.com

Office of the U.S. Trustee
ustpreion17.fr.ecf@usdoj.gov

D. Keith B. Dunnagan on behalf of Creditor California Energy Exchange Corporation
kbdunnagan@bpelaw.com; sarahm@bpelaw.com

Leena M. Sheet on behalf of Creditor California State Lands Commission
Leena.Sheet@doj.ca.gov

Donald C. Oldaker on behalf of Creditor Eagle Petroleum Monterey, LLC
doldaker@clifford-brownlaw.com; kmharleston@clifford-brownlaw.com

Hyun Suk Choi on behalf of Creditor Eagle Petroleum Monterey, LLC
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Hyun Suk Choi on behalf of Creditor Hanwha Resources (USA) Corporation
hchoi@choiandpark.com; lkleist@choiandpark.com

Chris D. Kuhner on behalf of Creditor Inproinvest, LLC
c.kuhner@kornfieldlaw.com

John J. Harris on behalf of Creditor Kings County Development Limited
jharris@cassosparks.com; ldominguez@cassosparks.com

Thomas R. Phinney on behalf of Creditor Paul Graham Drilling
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Michael N. Mills on behalf of Creditor Petro-Lud, Inc.
michael.mills@stoel.com; tammy.ross@stoel.com

Ashley Teesdale on behalf of Creditor Primoris Build Own and Operate LLC
ashley@ringstadlaw.com

Justin C. Valencia on behalf of U.S. Trustee Tracy Hope Davis
justin.c.valencia@usdoj.gov

Paul R. Glassman
pglassman@stradlinglaw.com; cpesis@stradlinglaw.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows:

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on December 1, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows:

Via Email

Office of the U.S. Trustee
ustpreion17.fr.ecf@usdoj.gov

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 1, 2022
Date

Christine Pesis
Printed Name

/s/ Christine Pesis
Signature